



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

Re: Crawford County
City of Crestline WWTP
NPDES Permit
Notice of Violation

March 13, 2008

Mayor and Council
City of Crestline
100 North Seltzer Street
Crestline, Ohio 44827

Dear Mayor and Council:

On October 16, 2007, an inspection of the City of Crestline Wastewater Treatment Plant (WWTP) was conducted. Ohio EPA representatives, Ms. Michelle Sharp and Mr. Walter Ariss met with Mr. Jeff Hatfield and Mr. Bill Justice. The inspection included a tour of the facility and completion of a checklist designed to evaluate the major areas of the treatment plant. Our inspection findings and recommendations are summarized below.

The mixed liquor in the counter current aeration tank was a healthy brown color. The effluent from the UV disinfection tank was clear.

Our review of the self monitoring reports covering the months of March 2007, through December 2007, for the Crestline WWTP found violations of the National Pollutant Discharge Elimination System (NPDES) permit. The specific instances of noncompliance are attached. Please be advised that failure to comply with the effluent limitations and/or monitoring requirements, including adequate laboratory controls, appropriate quality assurance procedures, and records retention, as specified in Part III-General conditions of your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111.

Ohio EPA representatives collected samples on September 17 and 18 and on October 15 and 16. The samples included a grab sample on each day and two 24 hour composite samples. These samples were collected for use in screening bioassays as part of toxics evaluation in conjunction with permit reissuance. The full reports of these tests are attached. Results from the September 17-18 test show that the effluent samples from Crestline WWTP outfall 001 were acutely toxic to *C. dubia*. The results from the October 15-16 test again showed that the effluent samples from outfall 001 were acutely toxic to *C. dubia*.

After our visit on February 21, 2007, the City installed a temporary, "flapper" type valve on the City's one combined sewer overflow (CSO). After a period of time, it was determined that the elimination of the CSO would not cause adverse effects on the City's sewer system. In Mr. Toy's September 19, 2007, email, he indicated that the temporary valve had been removed and the overflow outlet sealed with marine-grade plywood. A visit to the area on December 4, 2007, found that the seal had failed as noted in the attached pictures.

Due to this failure, the overflow is again experiencing intrusion from the creek and the City is again in violation of item #2 of the nine minimum controls (Maximum use of the collection system for storage) and #5 of the nine minimum controls (Elimination of CSOs during dry weather). Since the overflow is still in use, and no steps to permanently eliminate the CSO are being taken you are also in violation of the Compliance Schedule contained in your NPDES permit.

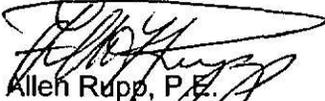
As advised in our August 22, 2006, letter to Mr. Toy, the City is in violation of the compliance schedule contained in the NPDES permit. The proposed schedule, provided to us by Mr. Toy, completes the schedule one year late. This schedule indicates that the City will clean the grit out of the 18" trunk sewer running to the plant and will be doing flow monitoring from March 2007 to May 2007. On September 19, 2007, we received an email from Mr. Toy with the flow study report completed by Richland Engineering. The email indicated that there were two sources of bottlenecking that were to be investigated: 1) the force main from the lift station is only an 8-inch diameter pipe and 2) the pumps are operating at only slightly more than half of their design capacity. In addition, the email stated that smoke testing was to be done in the vicinity of the lift station and former overflow to evaluate sources of inflow and infiltration and potential solutions. At this time, we have received no further communication about these investigations.

We recently received complaints about sewage in Paramour Creek from inadequate septic systems. As we have noted in the past, the city wide sanitary sewer location map for Crestline from Richland Engineering Limited dated February 1994 indicates that there are areas within the City limits that are not being served by public sewer. One area is bordered on the north and east by railroad tracks and on the west by Brant St. This is the area where the complaints are located. Another area is bordered by County Line Road, Arnold St. and Valley Ave. Please see the photos included with this letter that show specific instances of unsanitary conditions. These areas are a point of concern and the unsanitary conditions must be abated.

Please respond, in writing, addressing the above issues within 30 days of the date of this letter. A copy of our completed inspection form is enclosed for your review.

Unfortunately, due to a lack of responsiveness and attention to these issues, we are left with no choice but to refer the City for enforcement action. If you have any questions please contact Michelle Sharp at 419-373-3019.

Yours truly,



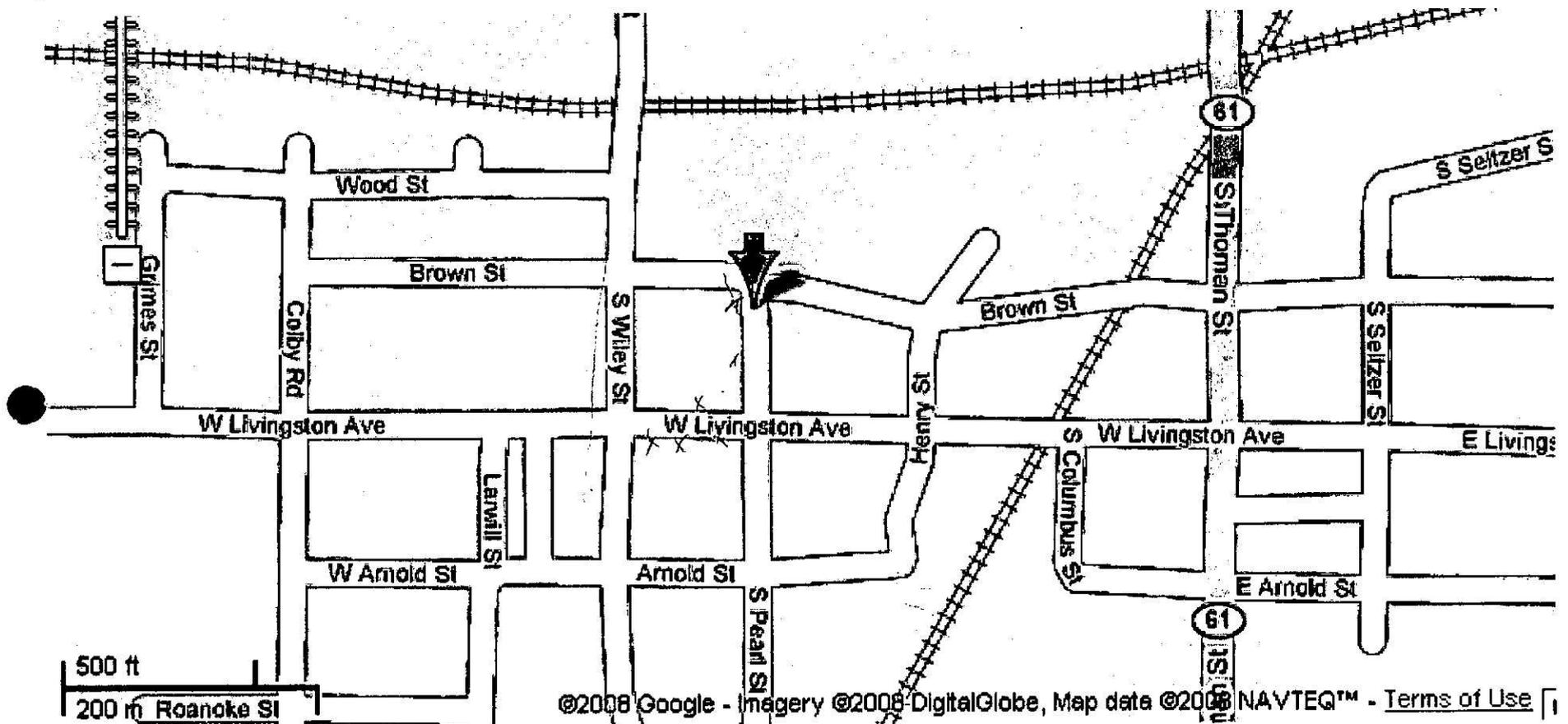
Allen Rupp, P.E.
District Engineer/Section Manager
Division of Surface Water

/lir

Enclosure

pc: [c:\DSW\NWDO\file w\attachments](#)
Mike Ritter, Crestline WWTP w/attachments
Tyson Quail, City of Crestline w/attachments
Stephanie Zmuda, Galion City Health Department w/ pictures
Kate Siefert, Crawford County Health Department w pictures

Pictures of Paramour Creek by 416 S. Pearl Street taken on December 15, 2005



Pipe
discharging into
Paramour
Creek



Toilet paper
and other
debris observed



Pipe
'ischarging into
Paramour
Creek

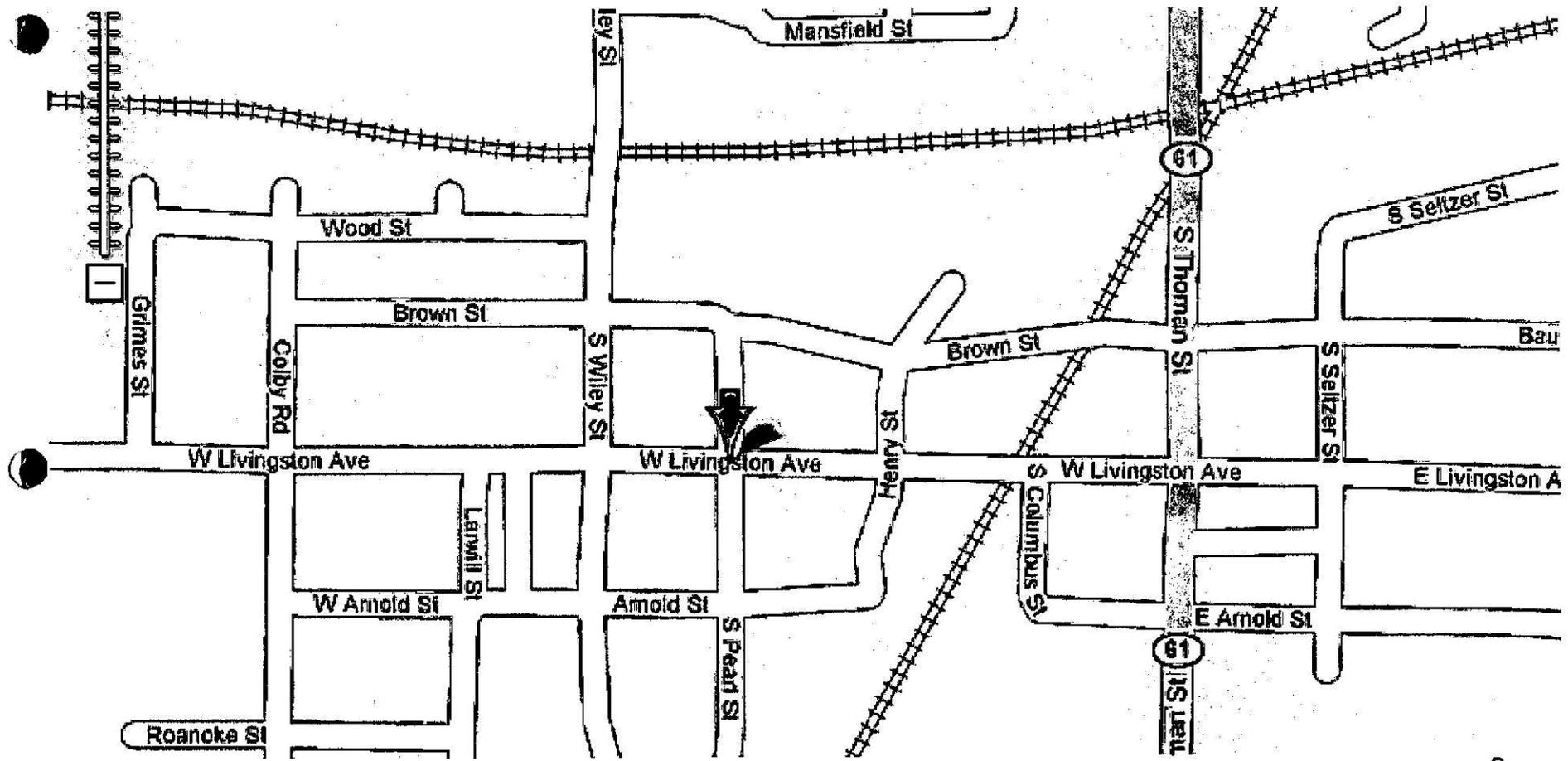


Toilet paper
and other
debris observed

Pipe
discharging into
Paramour
Creek



Pictures of a storm sewer discharging to Paramour Creek
at the corner of S. Pearl St. and
W. Livingston Ave. taken on
December 20, 2007





20 4:25 PM

Foamy Bubbles
Observed



20 4:25 PM

Violation Date	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value
3/1/2007	001	00530	Total Suspended Solids	30D Qty	43	69.8707
3/1/2007	001	00665	Phosphorus, Total (P)	30D Conc	1	3.705
3/1/2007	001	00665	Phosphorus, Total (P)	30D Qty	3.6	24.4841
3/15/2007	001	00530	Total Suspended Solids	7D Conc	18	36
3/15/2007	001	00530	Total Suspended Solids	7D Qty	65	239.692
3/15/2007	001	00665	Phosphorus, Total (P)	7D Conc	1.5	14
3/15/2007	001	00665	Phosphorus, Total (P)	7D Qty	5.4	93.6863
8/22/2007	001	00530	Total Suspended Solids	7D Qty	65	97.846
8/22/2007	001	00665	Phosphorus, Total (P)	7D Qty	5.4	7.69267
9/15/2007	001	80082	CBOD 5 day	7D Conc	15	27.3333



State of Ohio Environmental Protection Agency
Northwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
2PC00006	OH0020664	07/10/16	S	S	11

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
City of Crestline WWTP. 100 Westgate Drive Crestline, Ohio 44827.	1:00 PM	8/1/2004.
	Exit Time	Permit Expiration Date
	2:30 PM	7/31/2009.
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mr. Todd Hoffman, Operator	419-683-2836	
Mr. Jeff Hatfield, Operator	419-683-2836	
Mr. Eugene Toy, Administrator	419-683-3800	
Name, Address and Title of Responsible Official	Phone Number	
Mayor and Council City of Crestline 100 North Seltzer Street Crestline, Ohio 44827.	419-683-3800	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
<input checked="" type="checkbox"/> S	Permit	<input checked="" type="checkbox"/> S	Flow Measurement	<input type="checkbox"/> N	Pretreatment
<input checked="" type="checkbox"/> M	Records/Reports	<input checked="" type="checkbox"/> S	Laboratory	<input checked="" type="checkbox"/> U	Compliance Schedule
<input type="checkbox"/> M	Operations & Maintenance	<input checked="" type="checkbox"/> U	Effluent/Receiving Waters	<input checked="" type="checkbox"/> S	Self-Monitoring Program
<input checked="" type="checkbox"/> S	Facility Site Review	<input checked="" type="checkbox"/> M	Sludge Storage/Disposal	<input type="checkbox"/> N	Other
<input checked="" type="checkbox"/> U	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	

Inspector	Reviewer
	<i>Elizabeth A. Wick</i> 2/5/08
Date	Date
Division of Surface Water Northwest District Office	Elizabeth A. Wick, P.E. Water Quality Engineer Division of Surface Water Northwest District Office

Sections E thru K: Complete on all inspections as appropriate.
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application. (Industries)..... N/A
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

Section F: Compliance Schedules/Violations

- (a) Any significant violations since the last inspection..... Y
- (b) Permittee is taking actions to resolve violations..... N
- (c) Permittee has a compliance schedule..... Y
- (d) Compliance schedule contained in NPDES Permit
- (e) Permittee is meeting compliance schedule..... N

Comments/Status:

(a) Phosphorus and suspended violations during March, August, and September 2007.

(e) Received a flow monitoring report and report that the CSO had been permanently sealed. An inspection of the CSO on December 4, 2007 showed that the permanent fixture had failed.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained.

- (a) Standby power available.....generator or dual feed Y
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Operator holds unexpired license of class required by permit..... Y
Class: III
- (f) Routine and preventative maintenance schedule/performed
on time..... Y
- (g) Any major equipment breakdown since last inspection..... Y
- (h) Operation and maintenance manual provided and maintained..... Y
- (i) Any plant bypasses since last inspection..... N
- (j) Regulatory agency notified of bypasses..... N/A
On MORs and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... Y

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... Y
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N
- (d) CSO O&M plan provided and implemented..... Y
- (e) CSOs monitored and reported in accordance with permit..... Y
- (f) Portable pumps used to relieve system..... N
- (g) Lift station alarms provided and maintained..... Y
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... Y
- (j) Any complaints received since last inspection of basement flooding N/E
- (k) Are any portions of the sewer system at or near capacity..... N/E

Comments/Status:

(e) Mike Ritter, who holds a Class IV license, started working at the plant on November 6, 2007.
(g) The clutch froze in one of the screw pumps.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: 6/14/1986 Approval #:03-216-PW. Not submitted N/A
- (b) Sludge management plan current..... Y
- (c) Sludge adequately disposed..... Y
(Method:Landfill)
- (d) If sludge is incinerated, where is ash disposed of.....
- (e) Is sludge disposal contracted..... N
(Name:)
- (f) Has amount of sludge generated changed significantly since
last inspection..... N
- (g) Adequate sludge storage provided at plant..... Y
- (h) Land application sites monitored and inspected per SMP..... N/E
- (i) Records kept in accordance with State and Federal law..... N/E
- (j) Any complaints received in last year regarding sludge..... Y
- (k) Is sludge adequately processed (digestion, pathogen control)..... Y

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:Magmeter)
- (b) Calibration frequency adequate Y
(Date of last calibration: 10/1/2006)
- (c) Secondary instruments operated and maintained..... Y
- (d) Flow measurement equipment adequate to handle full range
of flows..... Y
- (e) Actual flow discharged is measured..... Y
- (f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Section I: Self-Monitoring Program (cont.)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... N/A
- (c) Analyses being performed more frequently than required by permit. Y
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: All parameters except D.O., pH, and temperature

Lab name: Ginosko

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: 2006

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	None	None	None	None	None	None	

Comments/Status:

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N/A
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Section L: Complete as appropriate for sampling inspections
Do not attach this page when completing reports for evaluation inspections

Section L: Sampling Procedures (for CSIs)

- Grab samples
- Composite obtained
- Compositing frequency..... Preservation
- Flow proportioned sample obtained
- Automatic sampler used
- Sample split with permittee
- Chain of custody employed
- Sample obtained from facility sampling device

Sample refrigerated during compositing yes no

Sample representative of volume and nature of discharge:

Comments/Status:

Permit # : 2PC00006
NPDES# : OH0020664

F. GUIDE - VISUAL OBSERVATION - UNIT PROCESS

Form Approved

OMB No. 158-R0035

RATING CODES: S = Satisfactory; U = Unsatisfactory; M = Marginal; IN = In Operation; OUT = Out of Operation

CONDITION OR APPEARANCE		RATING	COMMENTS
General	Grounds	S	
	Buildings	S	
	Potable Water Supply Protection	S	
	Safety Features	S	
	Bypasses		
	Stormwater Overflows		
	Alternate Power Source	S	Generator
Preliminary	Maintenance of Collection Systems	M	
	Pump Station		
	Ventilation		
	Bar Screen	IN	
	Disposal of Screenings	S	Landfill
	Comminutor	OUT	Back up unit
	Grit Chamber	IN	Aerated
	Disposal of Grit	S	Landfill
Primary	Flow EQ	IN	Old acration plant used for flow EQ
	Settling Tanks		
	Scum Removal		
	Sludge Removal		
	Effluent		
Sludge Disposal	Digesters	IN	3 AEROBIC UNITS and holding tank
	Temperature and pH		
	Gas Production		
	Heating Equipment		
	Sludge Pumps	IN	2 WAS, 2 RAS
	Disposal of Sludge	S	Land application
	Sludge holding tank		
Other	Flow Meter and Recorder	IN	
	Records	S	
	Lab Controls	S	
	Chemical Treatment	IN	
Secondary-Tertiary List items as	Aeration tanks	IN	1 counter current tank
	Blowers	IN	
	Secondary Clarifiers	IN	2 units
Disinfection	Effluent	S	
	Disinfection System	Out	not required until May- UV
	Effective Dosage		
	Contact Time		
	Contact Tank	S	